

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG, PA

APR 02 2025

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UNITED STATES OF AMERICA

: Docket No. 1:25-CR

v.

:

(Judge Wilson)

3:25-374(M)

AHN "KEVIN" TRAN, and
HUAN GUO

:

:

:

:

(Under Seal)

Defendants

:

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Trafficking in Counterfeit Goods
[18 U.S.C. § 2320(a)]

From on or about January 1, 2024, up to and including March 21, 2024, in York County, within the Middle District of Pennsylvania, and elsewhere, the defendants,

AHN "KEVIN" TRAN, and
HUAN GUO

did intentionally traffic in goods, specifically designer footwear, while knowingly using, on or in connection with such goods, counterfeit marks that were identical with and substantially indistinguishable from the genuine marks that were in use and registered by Nike and Adidas on the principal register of the United States Patent and Trademark Office,

the use of which counterfeit marks were likely to cause confusion, to cause mistake, and to deceive.

All in violation of Title 18, United States Code, Section 2320(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 2
Conspiracy to Traffick in Counterfeit Goods
[18 U.S.C. § 2320(a)]

From on or about January 1, 2024, up to and including March 21, 2024, in York County, within the Middle District of Pennsylvania, and elsewhere, the defendants,

AHN “KEVIN” TRAN, and
HUAN GUO

did intentionally and knowingly combine, conspire, confederate and agree with each other, and with persons unknown to the grand jury, to traffic in goods, specifically designer footwear, while knowingly using, on or in connection with such goods, counterfeit marks that were identical with and substantially indistinguishable from the genuine marks that were in use and registered by Nike and Adidas on the principal register of the United States Patent and Trademark Office, the use of which counterfeit marks were likely to cause confusion, to cause mistake, and to deceive.

All in violation of Title 18, United States Code, Section 2320(a).

THE GRAND JURY FINDS PROBABLE CAUSE:

FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging -forfeiture pursuant to Title 18, United States Code, Section 2323.

Pursuant to Title 18, United States Code, Section 2323, upon conviction of the offense in violation of Title 18, United States Code, Section 2320, the defendants,

**AHN "KEVIN" TRAN, and
HUAN GUO**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2323, any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of the offense, and any property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 2323.

A TRUE BILL

JOHN C. GURGANUS
Acting United States Attorney



WILLIAM A. BEHE
Assistant United States Attorney

Foreperson

Date

4/2/25